STEPTOE & JOHNSON LLP

ATTORNEYS AT LAW

Samuel M. Sipe Jr. 202.429.6486 ssipe@steptoe.com 217454

1330 Connecticut Avenue, NW Washington, DC 20036-1795 Tel 202.429.3000 Fax 202.429.3902 steptoe.com

September 1, 2006

Via HAND DELIVERY

The Honorable Vernon A. Williams Secretary Surface Transportation Board 1925 K Street, N.W. Washington, D.C. 20423 ENTERED Office of Proceedings

SEP 1-2006

Part of Public Record



Re:

STB Ex Parte No. 646 (Sub No. 1) – Simplified Standards for Rail Rate Cases

NOTICE OF INTENT TO PARTICIPATE

Dear Secretary Williams:

Pursuant to the Decision served by the Board on July 28, 2006, in the above proceeding, the Association of American Railroads (AAR) hereby submits its Notice of Intent to Participate in the proceeding and requests that copies of notices, decisions, comments, and pleadings in the proceeding be served on the AAR as follows:

Samuel M. Sipe, Jr. Frederick J. Horne Steptoe & Johnson, LLP 1330 Connecticut Avenue, N.W. Washington, D.C. 20036 (202) 429-3000 Louis P. Warchot Sr. Vice President – Law & General Counsel Association of American Railroads 50 F Street, N.W. Washington, D.C. 20001 (202) 639-2502

Respectfully submitted,

Samuel M. Sipe, Jr.

Counsel for the Association of American Railroads